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October 18, 2013

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

[Submitted electronically via ghg2013 Board Item at <http://www.arb.ca.gov/lispub/comm/bclist.php>]

Subject: Additional Comments for PUBLIC HEARING TO CONSIDER AMENDMENTS TO THE  
REGULATION FOR THE MANDATORY REPORTING OF GREENHOUSE GAS EMISSIONS

Chairman Nichols and Members of the Board:

The Procter & Gamble Paper Products Company (P&G) appreciates the opportunity to comment on CARB's 2013 Proposed Regulation Amendments on the Regulation for The Mandatory Reporting of Greenhouse Gas Emissions. P&G has a manufacturing facility in Oxnard, where we manufacture Bounty paper towels and Charmin toilet tissue, and distribute our product throughout the western United States.

We wish to provide the enclosed comments to Appendix A to the Staff Report, Section 95119 which covers mandatory GHG reporting requirements.

**Proposed Regulation Amendments – Mandatory GHG Reporting Requirements, Appendix A – Section 95119: Pulp and Paper Manufacturing**

The Procter & Gamble Paper Products Company recognizes the considerable effort CARB has invested in compiling extensive and detailed data to develop the proposed amendments to the Tissue benchmark and corresponding reporting requirements.

As proposed on page 66 – 68 of Appendix A to the staff report, Mandatory Greenhouse Gas Emissions Reporting, Article 2, Subarticle 1, Section 95119 (d), we support CARB's proposed approach that individual facilities report a single annual value: the production of air dried short tons of tissue produced adjusted by water absorption capability. This approach protects individual production volumes of certain brands as well as absorptive capacity of these products, while providing the data that CARB needs to ensure compliance. This approach also allows facilities to capture changes made to absorption capacity of the products, as well as production volumes on an annual basis.

As outlined in Section 95119 (d) (2), we must report weighted average water capacity for the combination of all tissue product types per the formula proposed. Though not clarified precisely, we presume that kitchen towels are

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a single tissue type and that bath (toilet) tissue is another tissue type. While we do not produce facial tissue at our facility in California, we presume that would be a separate tissue type. We ask for clarification on that point. In addition, while the language in (d) (2) says we must report the weighted average water absorption capacity of each tissue product type, we believe that CARB's intent, based on the formula provided, is that we take the kitchen towel production adjusted by water absorbency capacity and add that to bath tissue production adjusted for absorbent capacity to get the average value we report. We support this approach since it provides a single value from our facility and does not divulge competitive data on the relative amount of each tissue type produced.

The proposed rule in Section 95115 (d) (2) also specifies the test methodology utilized to define water absorption capacity, which is important. We support CARB's proposed test methodology. However the rule does not specifically require annual or routine testing of absorptive capacity. We suggest that entities should be able to utilize CARB's data on absorptive capacity of products for the annual weighted average water calculations OR, at the facility's option, should be able to conduct annual testing using the proposed test method.

We believe that if testing of absorptive capacity is to be conducted, it is important that the samples selected for testing are representative of product produced. We also feel that the amount of sampling and testing required should be reasonable in scope (e.g. one set of tests run per tissue type each year). Since in any given year the facility may produce several different tissue products for sale within each tissue product type, we think it is reasonable to test a single product for each tissue type, but that if that is done, the product tested should be the predominant tissue product for each tissue type produced during the year. Thus, for example, we would test the bath tissue product that we produced the most of during a given year. Records for the tissue product selected, supporting information, test method and results would be maintained by the site. Review of this absorptive capacity testing could be included as part of the facility's verification process. Alternatively, facilities could submit a test protocol to CARB prior to conducting tests. This protocol could describe the specific product in each tissue product type to be tested with the rationale for that selection, the number of samples to be tested and any other important information to assure that sampling and testing is performed accurately and is representative of production.

We thank the Board and CARB staff for their work on updating the tissue product benchmark and for the opportunity to provide these comments on the reporting requirements proposed.

Respectfully,



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Plant Manager, Oxnard  
The Procter & Gamble Paper Products Company